

## **Exhibit F**

Appellant  
M. Halabi  
First Affidavit  
Exhibit "MH1"  
2 February 2022

**IN THE SUPREME COURT OF THE UNITED KINGDOM**  
**ON APPEAL FROM THE COURT OF APPEAL**  
**(ENGLAND)**

**BETWEEN**

**RAS AL KHAIMAH INVESTMENT AUTHORITY**

**Respondent**

**and**

**FARHAD AZIMA**

**Appellant**

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**AFFIDAVIT OF**  
**MAJDI EL HALABI**  
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I, **MAJDI EL HALABI**, of 68 Har Kitron St., Zur Hadassa, Israel, 9987500, state as follows:

1. I am an Israeli journalist and lawyer (non-practising). I make this affidavit on behalf of the Appellant, Farhad Azima.
2. In this affidavit I refer to documents which together comprise exhibit "**MH1**". Reference to page numbers in bold square brackets in this affidavit are references to that exhibit.
3. I have prepared this Affidavit without having had the opportunity to review the full range of my documents in detail. I have prepared the statement on an urgent basis as I understand that Mr Azima has a pending application for permission to appeal to the Supreme Court, which may be decided at any time, and that the evidence I give in this Affidavit may be relevant to that application.

4. I believe that the facts stated in this Affidavit are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

#### **My evidence in the RAKIA -v- Mr Azima proceedings**

5. I provided a prior witness statement dated 24 June 2019 in support of the Ras Al Khaimah Investment Authority ("**RAKIA**"), the Claimant in RAKIA -v- Azima (Claim no. HC-2016-002798) ("**RAKIA Proceedings**") (**MH1/1-4**).
6. My witness statement was inaccurate in several key respects regarding the data belonging to Mr Azima. As discussed more fully below, contrary to my witness statement and testimony, I did not find links to Mr Azima's data on the internet in August 2016, I was never asked by Stuart Page ("**Stuart**") to search for information about Mr Azima, and I did not conduct any such searches. The cover story that I gave in my witness statement was concocted during a number of meetings which took place between 2017 and 2019 between (variously), Neil Gerrard ("**Neil**"), David Hughes ("**David**"), Amit Forlit ("**Amit**"), Stuart and Jamie Buchanan ("**Jamie**").
7. On 29 January 2020, I testified as one of RAKIA's witnesses during the Trial in RAKIA's Proceedings. The transcript of my testimony is at **MH1/5-17**. As with my witness statement, my oral testimony regarding Mr Azima's hacked documents was untrue and inaccurate.

#### **Preparation of my False Witness Statement and Testimony**

8. As I explain in more detail below, I believe that other witnesses for RAKIA – specifically, Neil, Jamie and Stuart – knew that my testimony was false given that we all worked together to plan in detail and rehearse my false testimony over a series of meetings prior to the actual Trial.
9. Those meetings occurred during 2018 and 2019 at different locations including in Dechert LLP's offices in London, a hotel conference room in Cyprus, and the Hotel Moosegg in Switzerland, among other places.

#### **The Development of my False Cover Story**

10. I have worked with Amit on a number of his projects since 2014/2015, after he left

government service and became a private investigator. Amit introduced me to Stuart in around 2017 at a social event in Tel Aviv. As I explain further below, I met with Stuart again in 2018 and 2019.

11. In 2017, Amit asked me and I agreed to provide a cover story in which I would say that I had discovered links to Mr Azima's data to avoid the need for him to be revealed as the individual who had provided the links to Mr Page.

### **Meetings in Cyprus**

12. On around 25 October 2018, Amit arranged for me to meet with David, Jamie, Neil, Stuart and him in Cyprus to work further on the cover story.
13. After arriving at Larnaca airport, Cyprus, Amit and I travelled to the Hilton, where we met in a conference room. Amit and I started to discuss the cover story with Neil, Jamie, David and Stuart. This was the first time I had met Neil and Jamie. Amit introduced Jamie to me as working for the Ruler of Ras Al Khaimah and Neil as being a big lawyer at the law firm Dechert. The meeting started with Amit introducing me to Neil and David. Jamie and Stuart, together, joined part-way through.
14. The meeting only lasted about half an hour, when I was abruptly asked to leave the room as there appeared to be a disagreement. Amit apparently continued the meeting with the others and after another hour or so he joined me for lunch and told me we were going to return to Israel together that afternoon.
15. On around 21 November 2018, Amit arranged for a second meeting in Cyprus to take place to discuss the cover story. Amit and I met with David, Neil and Stuart to discuss. Neil ran the meeting and proceeded to go into more detail in relation to the cover story whilst David took detailed notes.
16. I was assured by Amit that it was very unlikely that the cover story would ever need to be used in Court.
17. I enclose at **MH1/18-19**, a copy of the relevant pages from my passport showing my entry to and exit from Cyprus for both meetings.

### **Meetings in London**

18. On around 1 May 2019, at Amit's request, I travelled to London (from Paris via Eurostar Paris) for a further meeting to discuss the cover story about the data. I travelled from Paris to London for the meeting.



19. I met with Amit, Stuart, and Neil at Amit's rental apartment which was part of the Metropolitan Hotel on Park Lane. I recall that a man named Sean was also at the meeting and another woman who I believe was either Amit's or Sean's girlfriend. Neil, Amit and I discussed further how I was to tell the cover story. Neil invited me to a further meeting at the Holmes Hotel the following day for lunch.
20. On 2 May, I met with Neil, Jamie and Amit for lunch at the Holmes Hotel to get to know each other better and discuss the cover story further for around an hour.
21. On 3 May 2019, I met with Neil, Amit, David at Dechert's London offices and we sat and talked through the cover story some more. This meeting lasted approximately one hour.
22. After it was finished, I had coffee with Neil, Amit and David in a separate area within the office. Neil and Amit then went to talk separately, and I was left with David. I was then collected by Lucy Ward ("**Lucy**") who took me to another room in Dechert's offices and introduced me to a partner from Dechert, Dorothy Cory-Wright ("**Dorothy**") who attended the meeting via video link. A third more junior person was there taking a note. I was then left alone with Lucy and Dorothy and the notetaker, and they asked me to tell them the cover story I had just rehearsed on how I had discovered the links to the data.
23. After this meeting I flew to Istanbul. A copy of my passport showing my entry to France and my exit to Istanbul is at **MH1/20**.

### Meeting in Switzerland

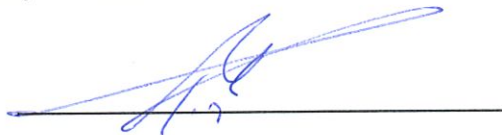
24. As the Trial approached, I was asked by Amit to attend a meeting in Switzerland with him, for Neil to test and rehearse Stuart's and my testimony for Trial during 1 to 3 December 2019.
25. Amit and I, together with several bodyguards, flew to Zurich, Switzerland and we drove to the Hotel Mooseegg near Bern for the meeting.
26. I attach at **MH1/21-40**, photographs I took of the hotel gardens and the hotel wifi password during my stay. I also attach copies of the stamps in my passport showing when I entered and left Switzerland (**MH1/41**).
27. Over the course of two days, Neil cross-examined me and Stuart repeatedly to fine-tune and test our testimony that we would give at trial. He spent considerable time

explaining to me details of the cover story which were still unclear to me.

28. At several points throughout my stay, I would be asked to step out of the room so that Neil and Amit could discuss matters privately. I got the impression that Neil and Amit were quite close.
29. I was originally booked to stay at the hotel for three nights. However, by the third day of my stay, Amit said that I could leave early.
30. Amit arranged my flight back to Israel and for one of the bodyguards to drive me to the airport.
31. Following the meeting in Switzerland, I again travelled to London to Stewarts Law for a witness familiarisation process at their offices.
32. I apologise for the false testimony I provided in my witness statement and trial testimony. I wish to submit this corrective Affidavit to address the falsehoods in my prior testimony. I understand that this Affidavit includes admissions that I have previously misled the English Court in my written and oral evidence, and I am aware that this could lead to proceedings against me for contempt of court and / or perjury and have had the opportunity to seek independent legal advice in relation to the consequences of making this Affidavit.

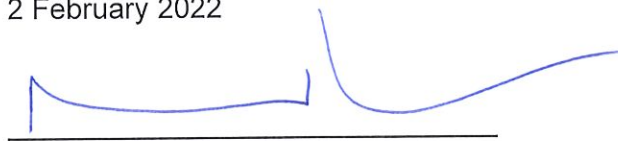
**SWORN** by Majdi Halabi

Signed:



Date: 2 February 2022

Before me:



Name:

DAVID CONNICK

Occupation:

Solicitor  
Philip Ross Solicitors

Address:

34 Queen Anne Street  
London W1G 8TE

On behalf of: Appellant  
Witness: Majdi Halabi  
Affidavit: First  
Exhibit: MH1  
Date: 1 February 2022

IN THE SUPREME COURT OF THE UNITED KINGDOM  
ON APPEAL FROM THE COURT OF APPEAL  
(ENGLAND)

UKSC 2021/0084  
ON APPEAL FROM  
CA No. A3/2020/1271  
[2021] EWCA Civ 349

BETWEEN

RAS AL KHAIMAH INVESTMENT AUTHORITY

Respondent

and

FARHAD AZIMA

Appellant

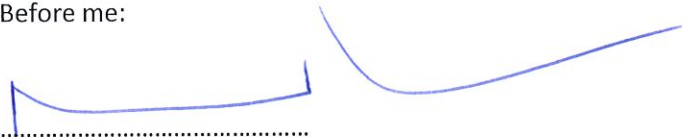
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EXHIBIT MH1  
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This is the exhibit "MH1" to the First Affidavit of Majdi Halabi



Majdi Halabi

Before me:



Name: DAVID ANNICK

Occupation: SOLICITOR Principal Rose Solicitors

Address: 34 Duke Ave West London W1G 8HE

Claimant  
Majdi El Halabi  
First  
~~24~~ June 2019

IN THE HIGH COURT OF JUSTICE Claim No. HC-2016-002798  
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES  
BUSINESS LIST (ChD)

BETWEEN:

RAS AL KHAIMAH INVESTMENT AUTHORITY

Claimant

-and-

FARHAD AZIMA

Defendant

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WITNESS STATEMENT OF MAJDI EL HALABI

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I, **MAJDI EL HALABI**, of 68 Har Kitron St., Zur Hadassa, Israel, 9987500, **WILL SAY** as follows:

1. I am an Israeli journalist and lawyer. I make this witness statement on behalf of the Claimant, Ras Al Khaimah Investment Authority ("**RAKIA**"). English is not my first language but I read, write and speak English well and I have made this statement in English.
2. Save insofar as is stated otherwise, the facts set out below are within my own knowledge or are derived from other sources or documents that I have seen and which in all cases I believe to be true. Where any facts are not within my knowledge, the source of those facts is stated.



### **Background**

3. I have been a journalist since 1992. I work for Elaph (an independent online Arabic publication based in England), as a senior editor and correspondent. I focus on issues in Israel and the Arab world generally, and I work as a freelance journalist in the same areas. I am a member of the international journalist committee in Israel and the Foreign Press Association. I am studying for a Masters and PhD at Ben-Gurion University on the history of the Middle East with a focus on Saudi Arabia. In 2012 I qualified as a lawyer and have my own firm serving clients in relation to business dealings between Israel and Palestine. For example I advise clients on complying with the procedures of the Israeli authorities to import or export goods from or to Palestine.
4. I first met Stuart Page in Jerusalem in 2012 at a private dinner event. He was coming to Tel Aviv and Jerusalem regularly around that time and we stayed in touch. We have never had a professional relationship but we exchange information. He sometimes asks me if I know information about certain topics or people based on my knowledge of the relationships between Israel and Arab countries. I do not ask Stuart why he requests information.

### **Request from Stuart Page in 2016**

5. At some point in early 2016 Stuart called me and asked me to keep an eye out for anything interesting and unusual relating to Ras Al Khaimah, His Highness Sheikh Saud, Khater Massaad and Farhad Azima. He may have mentioned other names too but I do not remember. I had heard of Khater Massaad because there were many articles about him in the media. I had not heard of Farhad Azima but recall noticing that his name sounded Iranian/Persian.
6. Stuart did not tell me why he wanted information relating to these people, he just said that if I found anything interesting to let him know. Stuart made requests like this from time to time. I do not remember further details about the conversation, however I believe it took place in March or April 2016. In

March 2016 I moved my office from Jerusalem to my home and I remember the conversation taking place in my new home office.

7. Following Stuart's request, I searched for those names on Google. I saw there were many articles about those individuals already. Every couple of days I would search again to see if there was anything new, interesting or different. I also spoke to a few contacts I was working with in the Gulf to check that I had the right names and to ask them to contact me if they heard or saw anything. I did not set up a "Google alert" as I search for lots of things and setting up alerts for them all would create too much "noise": I would be bombarded with emails from Google.

#### **Torrent data**

8. In early August 2016, whilst working in my home office, in one of my regular Google searches, I found links to a torrent containing information relating to Farhad Azima. I am familiar with such sites and come across them all the time in the course of my work. I do not download data from them because I am concerned about viruses. I usually pass the links to a computer expert and ask for a hardcopy. I thought it looked interesting because the title referred to Farhad Azima being exposed and in my experience torrents often contain interesting information. I did not try to download the material because of my concern about viruses. I called Stuart Page and told him that I had found something that he might find interesting. I provided him with two links via Whatsapp and he thanked me. I no longer have the phone I used for this. Whilst I do not recall precisely when this took place, I went on holiday in the second half of August for three weeks and I remember finding the material and calling Stuart before my holiday.
9. Following my call to Stuart, we did not discuss the matter again. Stuart did not raise the issue again so I considered that the matter was over. I was not interested in the data available because I did not consider it relevant to my area of work as there was no Israeli connection. At around this time, one of my contacts called me and said he had found the same material online. I thanked him but said that I had already found it.

**STATEMENT OF TRUTH**

I believe that the facts stated in this Witness Statement are true.

Signed.....

**MAJDI EL HALABI**

Date: 24.6.19



January 29, 2020

Ras Al Khaimah Investment Authority v Farhad Azima

Day 6

1 Wednesday, 29 January 2020  
 2 (10.30 am)  
 3 (Proceedings delayed)  
 4 (10.35 am)  
 5 MR LORD: My Lord, I'm sorry for keeping the court. I do  
 6 apologise to your Lordship and all here. I apologise in  
 7 public to them all for my forgetfulness.  
 8 JUDGE LENON: No problem.  
 9 MR TOMLINSON: My Lord, before we begin with the evidence,  
 10 there's one administrative matter which I ought to have  
 11 dealt with yesterday; I deal with now.  
 12 Your Lordship should have, on your Lordship's bench,  
 13 our proposed order in relation to the Buchanan documents  
 14 which were produced in the course of his evidence, an  
 15 order under CPR 31.22. The other side have seen a copy  
 16 and certainly I'm not aware that there's any objection  
 17 to it being made in this form.  
 18 JUDGE LENON: Very well. I will make that order.  
 19 MR TOMLINSON: So, my Lord, I will now call Mr Halabi.  
 20 JUDGE LENON: Yes.  
 21 MR MAJDI EL HALABI (affirmed)  
 22 Examination-in-chief by MR TOMLINSON  
 23 MR TOMLINSON: Could you be given bundle D, please? First  
 24 of all, could you give the court your full name and  
 25 address?

1

1 A. I am Majdi El Halabi. My address is 68 Har Kitron  
 2 Street, Zur Hadassa, Israel.  
 3 Q. Thank you. In the file in front of you -- you should be  
 4 at tab 6 -- there should be a document which has on its  
 5 first page "Witness statement of Majdi El Halabi". Do  
 6 you have that [D/6/1]?  
 7 A. Which one?  
 8 Q. I think it's the first -- if you turn over, I think it's  
 9 that document there.  
 10 A. Yes.  
 11 Q. If you look at the first page, does that have your name  
 12 on it?  
 13 A. Yes, it's my name.  
 14 Q. And if you turn to the last page of that document, so  
 15 it's page [D/6/4], is that your signature?  
 16 A. Yes, sir.  
 17 Q. Is there anything in that statement that you wish to  
 18 correct or clarify?  
 19 A. Maybe in paragraph 7 there is I think a misunderstanding  
 20 between me and lawyers [D/6/3]. When I said "a couple  
 21 of days", I didn't mean couple of days, two days. In  
 22 our language, in our slang, when we are talking and said  
 23 a "couple of days", it's some days. The correct word  
 24 can be "from time to time".  
 25 Q. Thank you. With that clarification, is that evidence

2

1 true and accurate in your statement?  
 2 A. Yes.  
 3 Q. And that's your evidence before his Lordship?  
 4 A. Yes, of course.  
 5 MR TOMLINSON: Thank you. If you could wait there,  
 6 Mr Halabi, there will be some questions.  
 7 A. Okay. Thank you.  
 8 Cross-examination by MR LORD  
 9 MR LORD: Mr Halabi, may I please just ask you about that  
 10 correction you made to your statement? Would you be  
 11 kind enough, please, to go to the first paragraph of  
 12 your statement at [D/6/1]? Have you got that?  
 13 A. Yes.  
 14 Q. Can you see what you said in the second sentence:  
 15 "English is not my first language but I read, write  
 16 and speak English well and I have made this statement in  
 17 English."  
 18 A. Yes, my Lord.  
 19 Q. So presumably you read this statement carefully before  
 20 you originally signed it?  
 21 A. Yes, my Lord.  
 22 Q. And when you came across paragraph 7, drafted as it was,  
 23 and you saw the reference to "every couple of days",  
 24 [D/6/3], why did you not change that before you signed  
 25 the statement?

3

1 A. Because, my Lord, in my language, with my slang, when  
 2 I talk with people and say "a couple of days" or "two or  
 3 three days", it's not the meaning of two days -- two  
 4 days. Maybe it be three, maybe it be five, six, seven,  
 5 week, something like that. But because of that, I think  
 6 that my slang, it's not the right word in this sentence,  
 7 my Lord.  
 8 Q. So is it "every few days" or is it "from time to time"?  
 9 A. It's "from time to time", it's -- also "few days" in our  
 10 language, it's not few; it can be nine.  
 11 Q. Right. Well, forget the idiom for a minute, forget the  
 12 way of summarising it. Tell his Lordship on oath how  
 13 often you think you performed the task that you're  
 14 referring to in paragraph 7 of your witness statement.  
 15 A. I don't understand. Can you repeat it, please?  
 16 Q. How often, how frequently?  
 17 A. I think it was, my Lord, something like four days, seven  
 18 days -- several times I search two/three days, one day  
 19 after day, and then I leave it when I was abroad or  
 20 I was busy and other things, and not stretched to the  
 21 computer and don't stretch to my office, something like  
 22 that.  
 23 Q. So sometimes it could be three days in the row --  
 24 A. Maybe, yes.  
 25 Q. -- and sometimes not for many days?

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Ras Al Khaimah Investment Authority v Farhad Azima

Day 6

1 A. Yes.  
 2 Q. Possibly weeks, not for weeks sometimes?  
 3 A. Maybe.  
 4 Q. Maybe? Not for months sometimes?  
 5 A. I don't think so.  
 6 Q. But it might be? There might a whole month --  
 7 A. No, not month.  
 8 Q. But a few weeks may go by, may have gone by, before you  
 9 did the next search?  
 10 A. I just make it clear, my Lord, that it's from time to  
 11 time. Sometimes it's two days, sometimes more than two  
 12 days, sometimes a week. It's the situation.  
 13 Q. Mr Halabi, the central purpose of your evidence,  
 14 I suggest, is to tell his Lordship on oath the way in  
 15 which you claim to have searched the internet in order  
 16 to discover the hacked data. That's right, isn't it,  
 17 Mr Halabi? It's the central purpose of your evidence,  
 18 isn't it?  
 19 A. In my evidence I give my evidence what happened truly  
 20 when Mr Page ask me to look something unusual about  
 21 those names, and I search in the computer and also  
 22 I talk with people in the Gulf and other places and ask  
 23 them about the names -- about the right names of the  
 24 people, and if they will see something about them,  
 25 something unusual, not in the Google, let me know. It

5

1 was like this.  
 2 Q. Mr Halabi, one of the important matters that you give  
 3 evidence about is your alleged searching of the  
 4 internet, isn't it?  
 5 A. One of them, yes.  
 6 Q. And I'm asking you to tell his Lordship how often you  
 7 think you carried out this searching task between when  
 8 Mr Page first asked you to do it and when you telephoned  
 9 him, as you say you did, in August 2016.  
 10 A. What's the exact question, please?  
 11 Q. For you to tell his Lordship as best you can recollect  
 12 how often you think you allegedly carried out this  
 13 search between the time that Mr Page first asked you to  
 14 keep a look-out and the time you say you telephoned  
 15 Mr Page in August 2016 with the news as to what you had  
 16 allegedly then found.  
 17 A. Okay. My Lord, Mr Page is a friend of mine and he asked  
 18 me to do him a favour. I write the name, searching in  
 19 my computer at my office home, home office, and I search  
 20 from time to time about the names that he ask me about  
 21 them, and it not -- it wasn't a kind of work that I am  
 22 doing for -- as a journalist or as a lawyer. It's  
 23 a favour for a friend and I did it from time to time.  
 24 When I find the links in torrent that -- according to  
 25 Mr Azima and the words "leaks" and "file leaks",

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1 I think that it was important and unusual. I called  
 2 Mr Page and told him about the -- what I find and he  
 3 thanks me and this matter was over. I want to clear  
 4 something, that this matter for me, my Lord, it wasn't  
 5 important for me as a work or as something that I am  
 6 going to do, article or something like that. It was  
 7 a favour for a friend.  
 8 JUDGE LENON: Mr Halabi, I'd like you to focus on the  
 9 question that you're being asked. You're being asked  
 10 how often do you think you did the search between the  
 11 time you were originally asked to do it by Mr Page and  
 12 the time when you spoke to him. Can you answer that  
 13 question?  
 14 A. I answered, my Lord. I answered the question.  
 15 I said -- I said that it's from time to time, several  
 16 times, every -- maybe it's three days, three days, then  
 17 maybe week, and it's not something that I remember very  
 18 well how often I do it and which times because I didn't  
 19 write any documents or comments about it because it was  
 20 a favour for a friend, my Lord.  
 21 MR LORD: So is it right, Mr Halabi, that you can't actually  
 22 provide any accurate indication to his Lordship as to  
 23 how often you think, even approximately, you performed  
 24 these searches?  
 25 A. It was, my Lord, a long time ago and I don't remember,

7

1 you know, specifically which days I search or not  
 2 search.  
 3 Q. Could I ask you, Mr Halabi, please, to go in your  
 4 witness statement to paragraph 1 again at {D/6/1}, where  
 5 you say:  
 6 "I am an Israeli journalist and lawyer."  
 7 Can you see that, Mr Halabi?  
 8 A. Yes.  
 9 Q. Then if you could please go to paragraph 3 on {D/6/2},  
 10 you set out there for his Lordship what you say is your  
 11 relevant background, don't you, Mr Halabi?  
 12 A. Yes.  
 13 Q. You explain that you've been a journalist since 1992,  
 14 you work for Elaph, "... an independent online Arabic  
 15 publication based in England), as a senior editor and  
 16 correspondent".  
 17 You go on to say:  
 18 "I focus on issues in Israel and the Arab world  
 19 generally, and I work as a freelance journalist in the  
 20 same areas. I am a member of the international  
 21 journalist committee in Israel and the Foreign Press  
 22 Association. I am studying for a Masters and PhD at  
 23 Ben Gurion University on the history of the Middle East  
 24 with a focus on Saudi Arabia. In 2012 I qualified as  
 25 a lawyer and have my own firm serving clients in

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Ras Al Khaimah Investment Authority v Farhad Azima

Day 6

1 relation to business dealings between Israel and  
 2 Palestine. For example I advise clients on complying  
 3 with the procedures of the Israeli authorities to import  
 4 or export goods from or to Palestine."

5 Can you see that, Mr Halabi?

6 A. Yes.

7 Q. Can his Lordship take it that that's all true and  
 8 accurate, what you set out there?

9 A. Yes.

10 Q. Now, your work, Mr Halabi, as a journalist, which you've  
 11 been doing for the last 28 years, that would involve,  
 12 wouldn't it, the need to make notes of your work?

13 A. Yes, my Lord.

14 Q. For example, if somebody telephones you with a news  
 15 story or a contact or a telephone number of someone he  
 16 might want to speak to, you'd want to make a note of  
 17 that information so you could pursue it, wouldn't you?

18 A. Of course.

19 Q. Can you tell his Lordship what your practice was in 2016  
 20 in relation to taking notes?

21 A. According to ... ?

22 Q. In the year 2016, what sort of practices did you have  
 23 for notes, for taking notes? Did you have a notebook or  
 24 a diary or lots of diaries or daybooks, for example?  
 25 What did you have?

9

1 A. I take notes on papers, then I move it to the computer  
 2 when it's something that I work with it. If I not work  
 3 with this material, I will throw it to the bin.

4 Q. So did you not have some sort of notebook?

5 A. I have my own notebook in my computer about my work that  
 6 I am doing in -- as a journalist.

7 Q. But you don't have any hard-copy notebook?

8 A. I have --

9 Q. Like a diary or -- like a diary or a --

10 A. I have notebooks -- when I am going to interview  
 11 officials in Israel or out of Israel, I write things  
 12 when I am interviewing them beside the taping, if they  
 13 allow to tape.

14 Q. Do you have something like a pocket book, something you  
 15 carry out around with you that you can write things in?

16 A. No, I am carrying it me. It's not something -- a book  
 17 that I write the things that I think that it's important  
 18 from -- for the interview that I am doing with officials  
 19 in Israel or with officials out of Israel, some -- in  
 20 the places that I am visiting or working as  
 21 a journalist, my Lord.

22 Q. So, as I understand your answer this morning, you would  
 23 make a note on paper and then, if it was important  
 24 enough, you would transfer that to your computer to  
 25 serve as a record; is that right?

10

1 A. Yes, my Lord.

2 Q. And how would that process of transferring to your  
 3 computer for recording purposes -- how would you do  
 4 that? How would you upload your handwritten notes into  
 5 some sort of electronic form?

6 A. I type it.

7 Q. Yes, but how would you go about storing it? Whereabouts  
 8 on your computer, that sort of thing, whereabouts -- how  
 9 would you do it? Send yourself an email or what  
 10 would you do?

11 A. No, I write it as a document.

12 Q. Sorry, I didn't catch that.

13 A. As a document, in Word document. I write the things.

14 Q. So if somebody sends you a telephone -- if somebody  
 15 says, "You really should speak to Mr Smith about this  
 16 story and here's his telephone number", what you do is  
 17 to create a Word document for that, is it?

18 A. I will write a number, then I will move it to my  
 19 diary -- my phone diary.

20 Q. Move it to your phone diary?

21 A. Yes.

22 Q. What sort of --

23 A. The numbers.

24 Q. Would that be an iPhone?

25 A. I have an iPhone now, yes.

11

1 Q. And did you have an iPhone back in 2016?

2 A. No, I didn't have iPhone in 2016. I have a Samsung.

3 Q. You had a Samsung mobile phone?

4 A. Yes.

5 Q. And you had that throughout 2016?

6 A. Excuse me?

7 Q. Did you have that device throughout 2016?

8 A. I don't have now a Samsung. I have only an iPhone since  
 9 two years.

10 Q. But in 2016, did you have your Samsung throughout 2016?

11 A. Yes.

12 Q. Did you have any other phones that you used in 2016?

13 A. Yes, I use several phones because I am using several  
 14 numbers, Jordanian number, Palestinian number, because  
 15 the -- in the Arab world, my Lord, we cannot connect  
 16 them by the Israeli phones. We must have a Palestinian  
 17 number or Jordanian number or British number, and  
 18 because of that I have several numbers.

19 Q. Do you mean several different phones as well?

20 A. I used to have three phones but now I am having one.

21 Q. But in 2016 did you have three phones?

22 A. Yes.

23 Q. And were they all Samsung?

24 A. Yes.

25 Q. And you used those to make different calls?

12



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1 A. To my sources.  
 2 Q. To your sources. And what has become of those three  
 3 phones or, rather, the records of them? What's become  
 4 of those?  
 5 A. I am -- I don't have these devices anymore. I don't  
 6 know what's ...  
 7 Q. What happened to them?  
 8 A. I put them on -- in the store for the -- I exchanged  
 9 phones and then I buy an iPhone and give them the  
 10 telephone -- the devices that I have before.  
 11 Q. All on the same occasion?  
 12 A. No, one of them on one occasion and the others I -- one  
 13 of them I gave to my son and he destroy it because he  
 14 was in the army and he destroyed it, the device.  
 15 Q. And when do you think you got rid of or disposed of each  
 16 of these three phones -- do you think, roughly? After  
 17 2016?  
 18 A. Not in 2016. Maybe in 2017. I don't remember  
 19 specifically when. But in the last two years I have  
 20 iPhone.  
 21 Q. And what other devices do you have for storing  
 22 information, Mr Halabi?  
 23 A. My comp -- my lap --  
 24 Q. Your computer, a laptop?  
 25 A. I have a laptop.

13

1 Q. And is that the same laptop that you had in 2016?  
 2 A. No.  
 3 Q. What did you have in 2016?  
 4 A. In 2016 I have my PC in my office, and then when I move  
 5 my office from Jerusalem to my home office I move also  
 6 the computer. Then I buy a new laptop at 2018, and this  
 7 computer is -- now we change it to a PC computer for my  
 8 son or my little son. He's 10 years old and he use it  
 9 to his -- for his studies in the school.  
 10 Q. So if you were going to carry out some research on the  
 11 internet, if you were going to carry out some research  
 12 to try to look for certain information on the internet  
 13 in 2016, how would you go about keeping a record of what  
 14 it was that you were looking for?  
 15 A. Again, my Lord, if it's something according to my work  
 16 as a journalist, I save the records, I save the files,  
 17 and I manage it as a file to work on it or to write  
 18 article. After I finish writing my article and sent it  
 19 to my newspaper, I will save the document if it's  
 20 necessary. If it's not necessary, I will destroy it or  
 21 delete it.  
 22 Q. And presumably, Mr Halabi, you still have access to the  
 23 same server that you used in 2016?  
 24 A. No.  
 25 Q. Why not?

14

1 A. Because I change the computer two years ago. I have my  
 2 laptop now. It's not the same server. It's laptop  
 3 with -- I download to the USB and back it in my USBs.  
 4 Q. Oh, I see. So is it right that you don't have any  
 5 server anymore to serve your information on?  
 6 A. I put it in my computer, in my laptop.  
 7 Q. But only on the laptop itself?  
 8 A. Yes.  
 9 Q. Not on some server some, not on some main --  
 10 A. No, I don't have a server. I don't used to have  
 11 a server. I have a computer and I save my documents in  
 12 my computer.  
 13 Q. And from what you just said, I think you said that  
 14 you -- would you save it onto a memory stick?  
 15 A. Again, please?  
 16 Q. How would you save -- if you're a journalist and if all  
 17 you're doing is storing your information on the laptop  
 18 itself and you lose the laptop, you've lost all your  
 19 data, haven't you, Mr Halabi?  
 20 A. I already said, my Lord, that I save documents -- the  
 21 necessary documents in USB.  
 22 Q. Are you telling his Lordship that with the work you set  
 23 out in paragraph 3, you only save material onto a USB  
 24 stick? Is that your evidence, that you don't have any  
 25 permanent server or some place that permanently backs up

15

1 your documents? What about your PhD, what about your  
 2 thesis?  
 3 A. I am working on it on my laptop and I save that  
 4 materials and the documents on the USB. When I need --  
 5 when I have a problem with the computer, I can go to the  
 6 USB and transfer it and download it in the computer and  
 7 working on it. And also I am -- I have a computer in  
 8 the Ben Gurion University that I am working on my PhD  
 9 there with my professor.  
 10 Q. And do you save your documents on the cloud?  
 11 A. No.  
 12 Q. It's right, isn't it, that you haven't produced a single  
 13 document to evidence what you say in your witness  
 14 statement you did for Mr Page allegedly in 2016?  
 15 A. There is no -- nothing that I can provide to this  
 16 because it's not -- it wasn't my -- something that  
 17 I work on it as a work, as an article, as I said, my  
 18 Lord, or as a work as a journalist or as a lawyer. It  
 19 was a favour for a friend. I don't save anything about  
 20 this, my Lord.  
 21 Q. So as far as you were concerned, it was a pretty  
 22 unimportant thing for you to be doing?  
 23 A. It wasn't a big issue for me. It was a favour for my  
 24 friend, and I respect my friends, I respect the requests  
 25 from my friends because of my tradition and my beliefs

16

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1 as a Druze human.  
 2 Q. In paragraph 3 of your witness statement you say this,  
 3 that you had your own firm serving clients in relation  
 4 to business dealings between Israel and Palestine. What  
 5 do those business dealings comprise? You've given an  
 6 example, but it looks as if that's only an example and  
 7 not all the business dealings of your firm. What else  
 8 does your firm do apart from advise on import/export?  
 9 A. I am -- my Lord, I am a self-employed in my own firm and  
 10 I am working with the Palestinians with companies that  
 11 are providing products and they import it and they  
 12 export and also import -- import to Palestine, and  
 13 I help them with the Israeli authorities. It's  
 14 a company of stones, that there is -- they are stones  
 15 for building, and the companies according to,  
 16 you know -- what's it called in English? Coca-Cola and  
 17 something like that -- not Coca-Cola, but that they are  
 18 exchange materials and products between Israel and  
 19 Palestine.  
 20 Q. And you have your own firm that basically does that  
 21 import/export business; is that right?  
 22 A. Not export and import business. I want to be clear --  
 23 I say that before -- I help them to do that with the  
 24 Israeli authorities because of the language and because  
 25 of the complicated of the process that it have been done

17

1 or must be done in these cases.  
 2 Q. Can I ask you, please -- in paragraph 4 of your witness  
 3 statement you say you met Stuart Page in Jerusalem in  
 4 2012. Can you see that {D/6/2}?  
 5 A. Yes, I see it.  
 6 Q. You said just now that Mr Page is and presumably was in  
 7 2016 a friend of yours; is that right?  
 8 A. Yes, of course.  
 9 Q. And roughly how often in 2016 would you meet or speak  
 10 with Mr Page, do you think?  
 11 A. Mr Page is my friend not only from 2016. It's before  
 12 that. But we met several times in Tel Aviv or in  
 13 Jerusalem when he was there and we met here in London  
 14 when I was in London, and we talk to each other several  
 15 times the year -- when it's necessary, when we meet and  
 16 we're meeting and we talk about several things, private  
 17 things, about his son, about my son, about things  
 18 that -- according to the Israelis, the Israelis /Arab  
 19 connections, and a lot of things that we are exchange  
 20 and talk about. He is one of my friends, and when  
 21 friends meet, talking a lot of things, my Lord.  
 22 Q. Would it be fair to say that Mr Page and you have some  
 23 mutual interests in the business sense?  
 24 A. No.  
 25 Q. There are aspects of your work that would interest

18

1 Mr Page and vice versa?  
 2 A. No, we never do something as a business because he's my  
 3 friend and, if you want to loose a friend, make  
 4 a business with him.  
 5 Q. So in paragraph 4 -- you don't, do you, in paragraph 4  
 6 explain that actually you're a friend of Mr Page, do  
 7 you?  
 8 A. Excuse me?  
 9 Q. Mr Halabi, in paragraph 4 of your witness statement you  
 10 explain how you met Mr Page --  
 11 A. Yes.  
 12 Q. -- and you explain how you and he exchanged information  
 13 as you describe, but you don't say in paragraph 4 that  
 14 actually Mr Page is a friend of yours, do you,  
 15 Mr Halabi?  
 16 A. Mr Page is my friend.  
 17 Q. Mr Halabi, could you look at paragraph 4 of your witness  
 18 statement, please? It's a short witness statement.  
 19 Paragraph 4. Have you got that?  
 20 Can you see anywhere in paragraph 4, when you  
 21 explain to his Lordship your relationship with Mr Page,  
 22 where you explain that actually you and he are friends?  
 23 A. My Lord, when we met then, we have a lot -- phone calls  
 24 and then we met again and again, we become friends.  
 25 It's the true. It's the thing that happened. I don't

19

1 think that I must write everything and said everything  
 2 for everybody when and which time he become my friend or  
 3 not become my friend. We met, we have a relationship,  
 4 we have -- share a lot of things and a lot of things  
 5 that we can share together. If it's something about  
 6 families or about his work, about my work, we talk and  
 7 we exchange informations, he gives me names, he  
 8 introduce me to people, I introduce him to people, and  
 9 we become friends since that time, my Lord.  
 10 Q. Mr Halabi, I'm not disputing that. I'm not challenging  
 11 what you've just said. I'm just asking you why you  
 12 didn't add into your statement that actually -- because,  
 13 Mr Halabi -- Mr Halabi, I will put it to you directly:  
 14 it would be relevant, wouldn't it -- it would be  
 15 relevant, when you come to give evidence, as you do,  
 16 essentially corroborating Mr Page's account about the  
 17 discovery of the hacked data -- it would be relevant for  
 18 his Lordship to know, wouldn't it, Mr Halabi, that you  
 19 as the corroborating witness were a friend of Mr Page?  
 20 Do you agree?  
 21 A. I repeat, Mr Page was my friend -- since we met and  
 22 talked and he become my friend, my Lord.  
 23 Q. So would it be fair to say that actually what you've  
 24 done in relation to this alleged discovery of the hacked  
 25 data is really a favour for Mr Page, a favour for your

20



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1 friend?  
 2 A. Yes, I say that.  
 3 Q. Thank you. And can you just confirm on oath that there  
 4 isn't a single document that you've produced that  
 5 evidences your actually performing this service for  
 6 Mr Page back in 2016?  
 7 A. No, again, it wasn't a work for me. It was a favour for  
 8 a friend, and I have no documents about it because, when  
 9 you talk with your friend, it's not matter for a court  
 10 or not a court, because I don't -- this matter I don't  
 11 know any things about it, about this matter with  
 12 Mr Azima or the others that they mentioned in this  
 13 court.  
 14 It was a favour for a friend, and I came and make my  
 15 statement because it was like this. What I said in my  
 16 statement, it was the truth and it is the truth,  
 17 my Lord.  
 18 Q. Mr Halabi, could you please go to paragraph 5 of your  
 19 witness statement at {D/6/2)?  
 20 A. Yes.  
 21 Q. You say this:  
 22 "At some point in early 2016 Stuart called me and  
 23 asked me to keep an eye out for anything interesting and  
 24 unusual relating to Ras Al Khaimah, His Highness  
 25 Sheikh Saud, Khater Massaad and Farhad Azima. He may

21

1 have mentioned other names ... but I do not remember."  
 2 Do you see that?  
 3 A. Yes.  
 4 Q. Can you go back to paragraph 4, please, just above that,  
 5 where you talk about Mr Page and you exchanging  
 6 information. You say this in the last three lines:  
 7 "He [that's Mr Page] sometimes asks me if I know  
 8 information about certain topics or people based on my  
 9 knowledge of the relationships between Israel and Arab  
 10 countries. I do not ask Stuart why he requests  
 11 information."  
 12 Do you see that?  
 13 A. Yes, I see it.  
 14 Q. Now, if we go back to what you say in paragraph 5, you  
 15 say Mr Page asked you in 2016. Mr Page wasn't asking  
 16 you, was he, about anything that would be related to  
 17 your knowledge of the relationship between Israel and  
 18 Arab countries?  
 19 A. Mr Page asked me to keep an eye and see if there's  
 20 something unusual about those names mentioned in my  
 21 statement, my Lord.  
 22 Q. Mr Halabi, what I'm asking you to focus on is that what  
 23 you describe Mr Page asking you in paragraph 5 of your  
 24 witness statement is not something that would be  
 25 included with what you've described in the last two

22

1 sentences of paragraph 4 of your witness statement, is  
 2 it?  
 3 A. I think for me it's the same. If he ask me about those  
 4 names and things that it's related between, I don't know  
 5 if those names had a relation -- or are related to the  
 6 Israelis or not, but I search about them. I see the  
 7 names, I see a lot of things in the computer about those  
 8 names and I keep an eye on it because I think it was  
 9 important for my friend, and when I find in torrent,  
 10 I tell him and I pass him the links and it's over there.  
 11 Q. Nothing Mr Page allegedly asked you in 2016 raised the  
 12 question of the relationship between Israel and Arab  
 13 countries, did it, Mr Halabi?  
 14 A. I repeat, I don't know if it's related or not because he  
 15 ask me about names. When I search, I didn't find  
 16 a relation between those people and Israel, but  
 17 I keeping searching about it because it's a favour for  
 18 my friend, my Lord.  
 19 Q. You said in paragraph 9 of your witness statement at  
 20 {D/6/3} -- you said in the second line:  
 21 "I was not interested in the data available because  
 22 I did not consider it relevant to my area of work as  
 23 there was no Israeli connection."  
 24 Can you see that?  
 25 A. Yes.

23

1 Q. So if we take that bit of evidence of yours back to  
 2 paragraph 5, did you wonder why Mr Page was asking you  
 3 in relation to Ras Al Khaimah, Sheikh Saud,  
 4 Khater Massaad and Farhad Azima when, on the face of it,  
 5 that didn't have any Israeli connection?  
 6 A. When I search, I don't find any Israeli connection, but  
 7 I keep an eye and, when I see something, I provide it to  
 8 Mr Page, my Lord.  
 9 Q. Mr Halabi, what I'm asking you is this, that -- I'm  
 10 suggesting to you that if in fact Mr Page had asked you  
 11 to keep an eye out for Ras Al Khaimah and the Ruler and  
 12 so on, if that had happened, you would have asked  
 13 yourself, "Well, why am I being asked about that because  
 14 that doesn't seem to have any Israeli angle to it".  
 15 That's right, isn't it, Mr Halabi? Why would you be  
 16 able to help in this regard?  
 17 A. I don't accept your explanation. I already have the  
 18 names and search the names. I saw there a lot of  
 19 articles about Khater Massaad and Ras Al Khaimah and he  
 20 steal money from Ras Al Khaimah and I see that  
 21 Farhad Azima is connected to the Americans, connected to  
 22 the Iranians. It was something like that. I keep  
 23 searching about something unusual, as he asked me, and  
 24 when I find it, I provide it to him.  
 25 Q. Did you make a note of what Mr Page was asking you to

24

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1 keep an eye out for at the time he first asked you?  
 2 A. I write the names, I stretch it in my computer, and  
 3 after I find the links I throw it in the bin because  
 4 it's not necessary anymore.  
 5 Q. Sorry, you write the names on a piece of paper?  
 6 A. Yes.  
 7 Q. Mr Page telephones you and you make a note, do you?  
 8 A. Yes.  
 9 Q. On a notepad or in your book, in your notebook?  
 10 A. No, in a paper that I stretch it in my computer.  
 11 Q. When you say "stretch it", what do you mean?  
 12 A. Put it like this (indicating).  
 13 Q. So you stuck the piece of paper --  
 14 A. Yes, "stuck it", sorry. Stuck it in my computer.  
 15 Q. With what, Sellotape or something?  
 16 A. No, it's like papers that -- yellow papers, white  
 17 papers.  
 18 Q. Post-its?  
 19 A. Those papers.  
 20 Q. I see. So you wrote it on a Post-it, did you?  
 21 A. Excuse me?  
 22 Q. You wrote it on a piece of yellow paper like that?  
 23 A. Yes, because it's several names -- it's two, three  
 24 names, four names, and I stuck it in my computer.  
 25 Q. On your laptop or your desktop, is this?

25

1 A. It was my PC, my computer and my office home.  
 2 Q. And you stuck it where? Actually on the front of the  
 3 computer?  
 4 A. In the side of the computer. There was a lot of things  
 5 there, not only this, my Lord.  
 6 Q. So this favour for Mr Page, you reduced to a Post-it  
 7 note that you stuck on your computer, did you?  
 8 A. I said "Yes".  
 9 Q. And did that Post-it note -- did it ever peel off at any  
 10 stage? Did it fall down?  
 11 A. I don't remember. No, I don't think so, but maybe if  
 12 it's fall down, I put it again because it's my office.  
 13 Q. How big was the Post-it note?  
 14 A. A little one.  
 15 Q. How big? Let's just see how big it was --  
 16 A. Like this one -- the yellow one here.  
 17 Q. What, that size (indicating)?  
 18 A. You're asking me -- I said like this one, the yellow  
 19 one, you see? If you can bring it, please, the  
 20 yellow -- yes, this one, like this.  
 21 Q. Like that?  
 22 A. Yes.  
 23 Q. Has your Lordship seen the --  
 24 JUDGE LENON: Yes, I would call that a large Post-it note.  
 25 MR LORD: And you wrote the names down on the Post-it notes?

26

1 A. Yes.  
 2 Q. And you stuck that on your computer?  
 3 A. Yes.  
 4 Q. With other Post-it notes?  
 5 A. Excuse me?  
 6 Q. Were there other Post-it notes?  
 7 A. Yes.  
 8 Q. Could you see the screen through the Post-it -- how many  
 9 Post-it notes were there? Was it hard to see the  
 10 screen?  
 11 A. Two or three. I don't remember. I don't remember.  
 12 You're asking me questions that -- I cannot remember  
 13 everything. It was at 2016. I have a lot of things  
 14 done since that time.  
 15 Q. And you say that Mr Page asked you to keep an eye out  
 16 for anything interesting and unusual relating to  
 17 Ras Al Khaimah, His Highness Sheikh Saud, Khater Massaad  
 18 and Farhad Azima?  
 19 A. Yes.  
 20 Q. And that's what he said to you, "anything interesting  
 21 and unusual"; is that right?  
 22 A. Yes, as I write.  
 23 Q. Did he mention that it was in relation to some sort of  
 24 publicity or PR campaign or not?  
 25 A. No, he don't mention anything of those things that you

27

1 are talking about.  
 2 Q. If you go, please, to paragraph 7 of your witness  
 3 statement -- sorry, paragraph 6 (D/6/2), you say that  
 4 you think this conversation with Mr Page took place  
 5 in March or April 2016. Can you see that?  
 6 A. Yes, I see that.  
 7 Q. So by the time you telephoned Mr Page in August, that  
 8 had been probably some four months after he first asked  
 9 you to perform this favour; is that right?  
 10 A. Yes.  
 11 Q. Four months?  
 12 A. Something like four months -- maybe less, maybe more.  
 13 Q. But about four months?  
 14 A. About.  
 15 Q. In paragraph 7 (D/6/3) you explain what you did and you  
 16 say this:  
 17 "Following Stuart's request, I searched for those  
 18 names on Google."  
 19 Do you see that?  
 20 A. Yes.  
 21 Q. So you did some Google searches, did you, for these --  
 22 as part of this favour?  
 23 A. Yes.  
 24 Q. And were they just simple Google searches?  
 25 A. Yes.

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1 Q. You just typed in the names, did you?  
 2 A. Yes.  
 3 Q. So you'd have typed in the name "Khater Massaad"?  
 4 A. Yes.  
 5 Q. And you'd have typed in the name "Ras Al Khaimah" --  
 6 A. Yes.  
 7 Q. -- and "His Highness Sheikh Saud"?  
 8 A. "Ras Al Khaimah", and I see there --  
 9 Q. All the names?  
 10 A. Yes.  
 11 Q. And you would do separate searches for these names,  
 12 would you?  
 13 A. I type every name separated, not together, all the  
 14 names.  
 15 Q. So you'd do a search for "Ras Al Khaimah", would you?  
 16 A. Yes.  
 17 Q. And then you'd do a search for --  
 18 A. But I don't see anything unusual about Ras Al Khaimah.  
 19 It was -- I think all of the things that when you search  
 20 about Ras Al Khaimah, you will see the page of Wikipedia  
 21 and other things that related to Ras Al Khaimah.  
 22 Q. But what you were doing, the way you were performing  
 23 this task, as it were, was simply to type in a name into  
 24 Google and hit "Return" to do a simple Google search?  
 25 A. Yes.

29

1 Q. And it wasn't limited by reference to any date range,  
 2 was it?  
 3 A. No.  
 4 Q. And it wasn't an advanced Google search, was it?  
 5 A. Excuse me?  
 6 Q. It was not an advanced Google search?  
 7 A. What is the meaning of "advanced"?  
 8 Q. Well, was it an advanced Google search?  
 9 A. What's "advanced", the meaning of "advanced"?  
 10 Q. It's a search where you can add in more properties to  
 11 your search.  
 12 A. No, no, it was simple -- as I said, it was simple  
 13 searching on the names that I get from Mr Page.  
 14 Q. Which would mean, wouldn't it, Mr Halabi, that every  
 15 time you did this simple search, all the previous  
 16 results would come up again, wouldn't they?  
 17 A. Yes, most of the time it's coming again and there was  
 18 new things. But it's things that it was in the media  
 19 because, if it's in the media, it's not interesting and  
 20 unusual.  
 21 Q. But the point I'm putting to you, Mr Halabi, is that,  
 22 without doing some sort of advanced Google search to  
 23 limit your search to new material, you would be  
 24 generating returns for material whenever it had been  
 25 published online, wouldn't you?

30

1 A. It is my usual work and I work in -- as such like this  
 2 way.  
 3 Q. How long do you think you spent on this searching when  
 4 you were undertaking it? How long did it take you?  
 5 A. Every time when I search it wasn't hours, it was  
 6 minutes. I don't think it takes me a lot of time,  
 7 but -- it was for a long time, but it's not taking me  
 8 a lot of time to search. I didn't search every day or  
 9 every hour. I searched from time to time. It's not  
 10 taking me a lot of time to do this search, my Lord.  
 11 Q. And roughly, though -- roughly -- how long did it take  
 12 you? You must have an idea. How long did it take you?  
 13 You press in "Ras Al Khaimah", how many entries come up  
 14 on a Google search, let's say, in April 2016 for  
 15 Ras Al Khaimah --  
 16 A. Look, I --  
 17 Q. Millions? Millions, was it? Millions of entries or  
 18 hundreds of thousands? How many?  
 19 A. I don't know because I see the first page and then I go  
 20 to the other things, and I learn fast reading. I am  
 21 fast reading and I can read fast. Most of my searches  
 22 was in Arabic language and others for English language.  
 23 Q. I see. So your evidence is that you would only really  
 24 look at the very first page of returns that comes up  
 25 from your simple Google search?

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1 A. Yes.  
 2 Q. And you wouldn't look at any of the other pages?  
 3 A. No, I don't think -- I don't remember if I look to other  
 4 pages, but usually not.  
 5 Q. Usually not. So you would get -- yes, I see. And if we  
 6 go -- if we went back to paragraph 7 of your witness  
 7 statement, please, at {D/6/3}, you say:  
 8 "Every couple of days I would search again to see if  
 9 there was anything new, interesting or different."  
 10 Do you see that in paragraph 7?  
 11 A. Yes.  
 12 Q. Then you said:  
 13 "I also spoke to a few contacts I was working with  
 14 in the Gulf to check that I had the right names and to  
 15 ask them to contact me if they heard or [had seen]  
 16 anything."  
 17 Who were the other contacts that you think you spoke  
 18 to about this favour?  
 19 A. As a journalist I have, my Lord, a lot of sources in  
 20 the Gulf and I keep the names to myself because it can  
 21 confuse them, and I have a lot of sources in the Gulf,  
 22 high-level officials, emirs and others, and my  
 23 colleagues, journalists in the Gulf.  
 24 Q. Why would these contacts know whether you'd got the  
 25 right names or not? How would they know the people you

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1 were searching for?

2 A. Because most of the people was related to the Gulf,

3 Ras Al Khaimah, His Highness, Khater Massaad, and

4 Mr Azima is Iranian one and it's in the Gulf also and

5 people knows his name.

6 Q. Sorry, Mr Halabi, you're a journalist and a lawyer.

7 Mr Page has phoned you up allegedly to ask you to search

8 some names. If you were uncertain about whether you got

9 the right names, why wouldn't you telephone Mr Page to

10 clarify things?

11 A. I do my first search and see the names, but you can

12 write it differently in Arabic and in English and other

13 language. Because of that, I ask one of my sources --

14 when I talk with him about I think something else and

15 I mention this thing and said, "How can we pronounce

16 'Azima Farhad'? It's 'Farhad' or 'Farhood' or 'Azima'

17 or 'Hazima'?", and I get the answers.

18 Q. And you say that you [D/6/3] "... did not set up

19 a 'Google alert' as I search for lots of things and

20 setting up alerts for them all would create too much

21 'noise'."

22 A. Yes.

23 Q. You would be bombarded with emails?

24 A. Yes.

25 Q. Now, you say in your witness statement [at paragraph 8]

33

1 that:

2 "In early August 2016, whilst working in my

3 home office, in one of my regular Google searches,

4 I found links to a torrent containing information

5 relating to Farhad Azima."

6 Can you see that?

7 A. Yes.

8 Q. Then about four lines up from the end of that paragraph

9 you say:

10 "I called Stuart Page and told him that I had found

11 something that he might find interesting. I provided

12 him with two links via WhatsApp and he thanked me. I no

13 longer have the phone I used for this."

14 Can you see that?

15 A. Yes, I see.

16 Q. And then in paragraph 9 you say in the first line:

17 "Following my call to Stuart, we did not discuss the

18 matter again."

19 Can you see that?

20 A. Yes, I see that.

21 Q. So can his Lordship take it that the only occasion when

22 you spoke to Mr Page to tell him that you had found some

23 interesting information of the sort that he had asked

24 you to look out for was this call in August 2016?

25 A. In this matter, yes.

34

1 Q. So you had not spoken to Mr Page about any other

2 interesting material that you'd found before the August

3 call?

4 A. No, because I didn't have any interesting material until

5 that time, my Lord.

6 Q. Yes, and nor did you speak to Mr Page again after this

7 first call in relation to this matter?

8 A. We didn't mention this matter -- he didn't mention it,

9 I didn't mention it, and I think it's over and I don't

10 know what happened there and what happened after that.

11 Now I know because of the court, but at that time it was

12 something that I did to him as a favour and it's over

13 for me, my Lord.

14 Q. So you understood, Mr Halabi, that after this first call

15 with Mr Page, you had effectively performed the favour

16 he wanted you to perform?

17 A. Excuse me?

18 Q. I think from that last answer you said, "We didn't

19 mention this matter -- he didn't mention it, I didn't

20 mention it, and I think it's over and I don't know what

21 happened there and what happened after that. Now I know

22 because of the court, but at that time it was something

23 that I did to him as a favour and it's over for me ..."

24 A. Yes, I said that.

25 Q. So what I'm suggesting to you is, after you made this

35

1 one and only call to Mr Page, you understood that you

2 had performed the favour that Mr Page had asked you to

3 perform; is that right?

4 A. Not exactly. After that, when I provided it to him and

5 he thanks me, then he didn't come back to me with this

6 matter, I think it's over, because it's past some weeks

7 that he didn't talk about it and didn't say anything,

8 and when we talk after that, he didn't mention it,

9 I think that it's over. I don't know what he did with

10 this and if he continued to search or not, but he thank

11 me and we go on in our relationship and I go on with my

12 work and my things that I am doing regular, my Lord.

13 Q. And it follows I think from your evidence today that you

14 didn't call Mr Page with any discoveries in

15 April 2016 -- sorry, any discoveries in relation to the

16 matters he'd raised with you --

17 A. No, because I didn't see anything unusual or interesting

18 because most of the things was in the media, and when

19 it's in the media, it's in the media and all over the

20 world.

21 Q. And his Lordship can take it, can he, Mr Halabi, that

22 you didn't call Mr Page about anything interesting in

23 relation to this particular request in May 2016?

24 A. No.

25 Q. Nor in June 2016?

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1 A. About this matter, no.  
 2 Q. Nor in July 2016?  
 3 A. Only when I find the links in torrent, I call him to  
 4 this matter and give him the links.  
 5 Q. And you say that you gave him links to two sites in the  
 6 course of this call; is that right?  
 7 A. Yes.  
 8 Q. And you sent him the two links via a WhatsApp message;  
 9 is that right?  
 10 A. What I remember, yes.  
 11 Q. And was that on the same day as the call, at about the  
 12 same time presumably?  
 13 A. After I have the phone call with him, I sent it to him,  
 14 in the same day, in the same time.  
 15 Q. Yes. So you called him to tell him the good news and  
 16 then you sent the links via a WhatsApp message; is that  
 17 right?  
 18 A. I called him to say that I find something interesting  
 19 and he asked me to send it to him by WhatsApp, I sent  
 20 it, and from that time, after several days or a week,  
 21 I think that this matter is over because nothing  
 22 happened and he didn't come back with anything about it.  
 23 Q. When you spoke to Mr Page about the discovery in August,  
 24 what did Mr Page say about it? Was he pleased? Did he  
 25 ask you -- did he say something? What did he say?

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1 A. No, he ask me where it is. I told him that, "It's in  
 2 this site, torrent site, there is the links that I can  
 3 send it to you or can tell you and you will write". He  
 4 said, "No, send it to me by WhatsApp", I think, and then  
 5 I sent it to him, my Lord, and it's over.  
 6 It was not a long discussion about it because it's  
 7 a matter for -- he ask me and I -- when I find something  
 8 interesting and unusual like this thing, this site,  
 9 torrent, I don't download it, I don't see anything in  
 10 it, but it was interesting from the title, "Devices",  
 11 "Files", "Leaks", "Scam", something -- I understand that  
 12 it was something that exposed to the internet and  
 13 I think that it's unusual and interesting, and I told  
 14 him what I find and then I provide it by WhatsApp, and  
 15 that's it, my Lord.  
 16 Q. And did you find both these links -- so the two links --  
 17 did you find those in the course of the same search?  
 18 A. Yes, when I find the first one in torrent, when you  
 19 click it, you go to other one and the other one is to  
 20 download it. I don't download it because I am not  
 21 downloading anything in my computer that unknown, like  
 22 those sites, torrent or anything else.  
 23 Q. But you provided Mr Page, you said, with two links via  
 24 WhatsApp. Can you see that?  
 25 A. Yes, the link of the -- in the internet, in the first,

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1 and the other link is when you click it, you can see it.  
 2 Q. Could you be shown, please, {F/10}? Do you see that,  
 3 Mr Halabi? Can you see that?  
 4 A. I see.  
 5 Q. Have you seen something like that before?  
 6 A. No.  
 7 Q. Was that not one of the things that you came across in  
 8 this search?  
 9 A. No.  
 10 Q. Are you sure about that?  
 11 A. Yes, yes, my Lord, I didn't see this.  
 12 Q. You said I think you came across something that said  
 13 "Farhad Azima exposed", didn't you? Didn't you say that  
 14 just now?  
 15 A. I understand that Mr Azima exposed, but I see the links  
 16 that talking about "leaking files", "Azima Farhad" and  
 17 "scam", words like that, and I think that it's  
 18 interesting and then I told Mr Page.  
 19 Q. You can see that this appears to be a blog posted on  
 20 7 August 2016 titled:  
 21 "Farhad Azima, CEO of Aviation Leasing Group --  
 22 Exposed Again."  
 23 Can you see that?  
 24 A. I see the title, yes.  
 25 Q. Then you see:

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1 "To read more click on given links and download  
 2 torrent."  
 3 And it lists to sites monova and piratebay. Can you  
 4 see that?  
 5 A. Yes, I see it now.  
 6 Q. Might this have been something that you found in your  
 7 search?  
 8 A. No, I didn't find this.  
 9 Q. And what about the -- if you could be shown {F/11},  
 10 please, is that something you recognise?  
 11 A. No.  
 12 Q. Might you have seen that?  
 13 A. No.  
 14 Q. That's another blog about Farhad Azima saying  
 15 "Farhad Azima Scam". Can you see that at the top?  
 16 A. Yes.  
 17 Q. It's 8 August 2016, can you see?  
 18 A. I don't see that before. Now I am seeing it.  
 19 Q. And you don't think that this was something that you  
 20 think that you saw?  
 21 A. No.  
 22 Q. Right. When you allegedly found this material in one of  
 23 your searches, to which search term had this material  
 24 responded?  
 25 A. Excuse me? I don't understand.

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1 Q. Well, you've given evidence of the four different names  
2 that you were searching about: Ras Al Khaimah, the  
3 Sheikh, Dr Massaad and Mr Azima.  
4 A. Yes.  
5 Q. So which of those searches -- in response to which of  
6 those names when you were searching did you allegedly  
7 get this information, the response, the hit?  
8 A. When I search about Azima.  
9 Q. And what about when you typed in "Massaad", did that  
10 bring it up as well?  
11 A. No.  
12 Q. Why was that?  
13 A. I don't remember. I don't know.  
14 Q. And whereabouts -- is it your evidence that the material  
15 you found in this Google search in relation to Mr Azima,  
16 that came up on the first page of your Google search?  
17 A. Yes, it was in the first page, and I think because of --  
18 it was in the first page and torrent -- linking to  
19 torrent, it was -- for me it was unusual and  
20 interesting. Then I do what I did.  
21 Q. So the material that you claim you found in relation to  
22 Mr Azima in this early August 2016 Google search you did  
23 came up on the first page of your Google search?  
24 A. Yes. I said "Yes".  
25 Q. Because you'd only ever, in your evidence, scrolled down

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1 the very first page, hadn't you, of the Google search?  
2 A. Most of the time.  
3 Q. Could you please go to {G/26.16}? Can you see  
4 {G/26.16}, Mr Halabi?  
5 A. Yes.  
6 Q. Have you seen this document before?  
7 A. No.  
8 Q. Never?  
9 A. Never.  
10 Q. Never? For the transcript, you've never seen something  
11 like this before?  
12 A. I don't see this --  
13 Q. No.  
14 A. -- before, my Lord.  
15 Q. This is an article which appeared on the internet on  
16 19 May 2016. Can you see in the middle of the page?  
17 A. Yes, I see it.  
18 Q. Can you see it's the Kansas City Star, which is I think  
19 some sort of publication. Can you see?  
20 A. What -- where?  
21 Q. At the top. Can you see the heading --  
22 A. Ah, okay. This one, okay.  
23 Q. Can you see the heading:  
24 "Iranian-born KC aviation figure with colourful past  
25 appears in Panama Papers."

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1 Can you see that?  
2 A. Yes.  
3 Q. It's about Mr Azima, isn't it? Can you see?  
4 A. Yes.  
5 Q. If you want to just turn the pages to yourself  
6 {G/26.16/1-6}, you can see the sorts of things that it  
7 covered, headings like "Milk, Oil and Planes", "Guns On  
8 Board", if you keep going, "Panama Problems", "Political  
9 Money". Can you see that? Can you see all that?  
10 A. Okay.  
11 Q. Mr Halabi, if you'd seen this on the internet when you  
12 were doing your Google searches, as you allege, this  
13 would have qualified as a new or interesting internet  
14 article concerning Mr Azima, wouldn't it?  
15 A. I don't think so because it's in the internet and it's  
16 in the media and in Panama Papers, everybody can see it.  
17 It's not unusual because if it's -- I don't see this  
18 one.  
19 Q. Right. I think your evidence was that you've never seen  
20 this before, so you didn't in fact come across it?  
21 A. No.  
22 MR LORD: My Lord, would that be a convenient point to have  
23 the short break?  
24 JUDGE LENON: Yes.  
25 MR LORD: I'm grateful.

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1 JUDGE LENON: Mr Halabi, you can step down, but you mustn't  
2 talk about your evidence with anybody.  
3 (11.40 am)  
4 (A short break)  
5 (11.45 am)  
6 MR LORD: Could you please be shown {D/3/6}, Mr Halabi?  
7 This is Mr Page's witness statement in relation to this  
8 case, Mr Halabi. Have you seen this statement before?  
9 A. No.  
10 Q. Never?  
11 A. No.  
12 Q. Can you see in paragraph 19 what Mr Page here sets out?  
13 He says this:  
14 "At some point later this year, I do not recall  
15 specifically when, Majdi called me and told me that he  
16 had come across something interesting on the internet  
17 about Farhad Azima. He did not tell me how he had come  
18 across this information. He told me that he didn't want  
19 to open the site because it might have harmful viruses  
20 and he suggested I shouldn't either."  
21 Can you see that? Then it reads on. Read the whole  
22 paragraph if you like.  
23 A. Yes, I see that.  
24 Q. All right. Can you just confirm that, as far as you  
25 recollect things, you did not tell Mr Page how you'd in

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1 fact come across this information?  
 2 A. I don't think so. I don't remember. I don't think that  
 3 I told him how I find it because it was simple search,  
 4 my Lord.  
 5 Q. Then if you look, Mr Page says at the end of that  
 6 paragraph, after referring to the WhatsApp message -- he  
 7 says this:  
 8 "He also told me that he believed the information  
 9 came from the UAE. I did not ask why he thought this."  
 10 Can you see that, Mr Halabi?  
 11 A. I see that.  
 12 Q. Now, you've given evidence that you only had one  
 13 conversation with Mr Page in relation to this matter,  
 14 haven't you?  
 15 A. Yes.  
 16 Q. So do you think that you did tell Mr Page in that one  
 17 conversation that you thought this information that you  
 18 had come across came from the UAE?  
 19 A. I don't remember, my Lord. Maybe I said, maybe not.  
 20 I don't know. I don't remember. I told him that there  
 21 is something interesting and we -- I -- and then  
 22 I provide him the links. I don't remember if I said  
 23 that or not. Maybe it was related to another thing, but  
 24 I don't remember if I said. You can ask Mr Page if --  
 25 why he said it.

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1 Q. Right. I put it to you, Mr Halabi, that you did not  
 2 carry out this internet searching for Mr Page as you've  
 3 described.  
 4 A. Excuse me?  
 5 Q. I put to you that you're making up your evidence that  
 6 you carried out this internet searching for Mr Page.  
 7 You're making it up.  
 8 A. I don't understand what you are meaning in "making up".  
 9 Q. I'm suggesting to you that you did not carry out  
 10 internet searches for Mr Page every few days for four  
 11 months in 2016.  
 12 A. Absolutely not. You are wrong. I don't ...  
 13 Q. And you did not actually carry out any internet  
 14 searching for Mr Page of the sort that you're describing  
 15 in this witness statement.  
 16 A. What I describe in my witness statement, it's the truth.  
 17 Q. And that you've given this statement, you've signed this  
 18 statement, as a favour to Mr Page, haven't you?  
 19 A. No, absolutely no.  
 20 Q. And you have done that in order falsely to claim that  
 21 you played a part in the discovery of this hacked  
 22 material of Mr Azima's in August 2016.  
 23 A. No, absolutely not. I deny this, my Lord. It's ...  
 24 Q. And you've done that because of your friendship with  
 25 Mr Page, haven't you?

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1 A. No, not. When I give a statement for the court, I give  
 2 a statement for the court as a human being and I am also  
 3 a lawyer, and I know what it's going when you give  
 4 a statement for the court, and I respect the court and  
 5 I give my statement as a truth that what has happened in  
 6 this matter and that time.  
 7 Q. Are you being paid, Mr Halabi, directly or indirectly,  
 8 in relation to your alleging the account of your  
 9 searches that you've given in the case?  
 10 A. No.  
 11 Q. Are you sure about that?  
 12 A. Yes, of course.  
 13 Q. I put it to you, Mr Halabi, that you have invented the  
 14 whole thing.  
 15 A. I deny this. I disagree. It's not true.  
 16 MR TOMLINSON: My Lord, I've no re-examination. Does  
 17 your Lordship have any questions for this witness?  
 18 JUDGE LENON: Yes, I have one question.  
 19 Mr Halabi, what did you consider was the point of  
 20 you carrying out Google searches when presumably Mr Page  
 21 could have carried out Google searches himself?  
 22 A. I think that he think that, because I am expert in the  
 23 Arab world and -- the Israeli and the Arab world, I can  
 24 find something that he cannot find, according talking  
 25 with also sources in the Gulf that I know and I have

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1 connections with them and he know some of them. That is  
 2 there was in high level officials and others.  
 3 JUDGE LENON: Well, I understand what you say in relation to  
 4 Arab sources, but in terms of doing simple Google  
 5 searches, which is what I understand you said you were  
 6 doing, that was presumably something that Mr Page could  
 7 have done himself.  
 8 A. I don't know what -- why he asked me, and I did it as  
 9 a favour for him, and I search, then I asked some people  
 10 in the Gulf, and when I have something that I think that  
 11 it was interesting, I call him and tell him that.  
 12 I don't know what Mr Page did or not did in this matter,  
 13 my Lord.  
 14 JUDGE LENON: But he could have carried out these Google  
 15 searches himself, couldn't he?  
 16 A. I think yes, but when he ask me a favour, I do it for  
 17 him because he is my friend and I respect my friends,  
 18 my Lord.  
 19 JUDGE LENON: Thank you.  
 20 MR TOMLINSON: There is one matter arising out of that,  
 21 my Lord.  
 22 Re-examination by MR TOMLINSON  
 23 MR TOMLINSON: Just to be clear, Mr Halabi, what languages  
 24 did you search in when you were doing your searches?  
 25 A. Arabic and English and sometimes in Hebrew, but there is

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1 nothing in Hebrew about this matter.  
 2 MR TOMLINSON: Thank you. May this witness be released?  
 3 JUDGE LENON: Yes. Thank you, Mr Halabi.  
 4 A. Thank you, my Lord.  
 5 MR TOMLINSON: My Lord, before calling the next witness,  
 6 I want to make sure how we're doing in timetabling terms  
 7 because we've put Mr del Rosso off until tomorrow. The  
 8 position is that Mr King can only do tomorrow morning,  
 9 Mr Leach can't do tomorrow morning and --  
 10 MR LORD: Sorry, my Lord, I'm eight minutes ahead of time or  
 11 ten minutes which is unusual, so I've made a little bit  
 12 of time. I would anticipate that I won't need more  
 13 than -- I don't think I will need more than an hour with  
 14 Mr Leach and I would estimate roughly half a day -- it  
 15 might be longer -- with Mr Page. So I'm trying to  
 16 finish both Mr Leach and Mr Page today. I hope to be  
 17 able to do that. But if my learned friend wants to call  
 18 Mr Leach first to be sure that he can get away today,  
 19 because Mr Page could come back tomorrow if required,  
 20 then that would be fine as far as we're concerned. But  
 21 I'm in your Lordship's hands and those of my learned  
 22 friend, of course, whose evidence he is calling.  
 23 MR TOMLINSON: Unfortunately I don't have Mr Leach here at  
 24 the moment.  
 25 My Lord, the possibilities are I think that Mr Leach

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1 is interposed in Mr Page's evidence at, say, 3.00, if my  
 2 friend thinks -- or 3.30 if my friend thinks he will be  
 3 an hour or that we put Mr Leach off till -- I think he  
 4 can do tomorrow afternoon.  
 5 MR LORD: My Lord, I was expecting to deal with -- I spoke  
 6 to my learned friend about this yesterday -- I was  
 7 expecting to deal with Mr Page and Mr Leach today, so  
 8 I would prefer to start with Mr Page, as planned, and  
 9 interpose Mr Leach if necessary, but if I finish Mr Page  
 10 in time, with an hour to go, then we can just go on in  
 11 the normal way and he will be away this afternoon.  
 12 JUDGE LENON: Let's carry on on that basis.  
 13 MR TOMLINSON: If we revisit at the break in the afternoon.  
 14 I'm certainly going to call Mr Page next. I just wanted  
 15 to ensure what we were going to do about Mr Leach.  
 16 JUDGE LENON: That's very helpful. Thank you.  
 17 MR TOMLINSON: So, my Lord, I call Mr Page.  
 18 MR STUART ROBERT PAGE (sworn)  
 19 Examination-in-chief by MR TOMLINSON  
 20 MR TOMLINSON: Could you give the court your address,  
 21 Mr Page?  
 22 A. Number 14 -- sorry, my business address, your Honour, or  
 23 my home address?  
 24 Q. I think your home address is on the witness statement.  
 25 A. Right, number 14 --

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1 Q. No, perhaps that's your business address. I apologise.  
 2 The business address.  
 3 A. It's The Sanctuary and it's -- shall I give the full  
 4 address? It's The Sanctuary, Westminster, SW1.  
 5 Q. Could you look -- there should be a bundle there in  
 6 front of you labelled "D", and then if you go to tab 3.  
 7 {D/3/1} --  
 8 A. Correct, yes, I have it, yes.  
 9 Q. -- that should be a document that says "Witness  
 10 statement of Stuart Robert Page" on the first page.  
 11 A. Yes.  
 12 Q. Then if you turn to page {D/3/7}, is that your  
 13 signature?  
 14 A. That is my signature, my Lord.  
 15 Q. Are there any matters in that statement that you wish to  
 16 correct or clarify, Mr Page?  
 17 A. Yes, there are.  
 18 Q. Do you want to indicate what they are?  
 19 A. In reference to my police service, which is on  
 20 "Background" at 3, the date I left the police was 1978,  
 21 not 1979 {D/3/2}.  
 22 Q. Thank you.  
 23 A. And there is a reference, my Lord, to the name of my  
 24 company in Dubai. It's actually called "Page Group  
 25 Middle East FZE". I think it's in the statement as

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1 "SZE".  
 2 The other part of my statement, my Lord, is where  
 3 I talk about reference to reviewing documents, but then  
 4 I mention in my statement, my Lord, that I did not --  
 5 I'm not familiar with the name of Farhad Azima.  
 6 Q. And what did you want to correct in relation to that,  
 7 Mr Page?  
 8 A. Having been shown a report which was prepared by my  
 9 firm, I'm now aware that I was -- should have been  
 10 familiar with that name.  
 11 Q. What report is that?  
 12 A. It's a report which I was shown by the -- by  
 13 Stewarts Law.  
 14 Q. I'm sorry, Mr Page?  
 15 A. Sorry, my Lord, I was asked to look at a document by  
 16 Stewarts Law and asked to confirm whether that was my  
 17 report or not.  
 18 Q. Can you be shown {H7/298} please? It is {H7/299}, the  
 19 next page. Sorry. Is that the document you are  
 20 referring to?  
 21 A. That is the document, my Lord.  
 22 Q. And sorry, Mr Page, what's your evidence about that  
 23 document?  
 24 A. Well, I was not -- when I prepared my witness statement,  
 25 my Lord, I was not -- did not recall that we submitted

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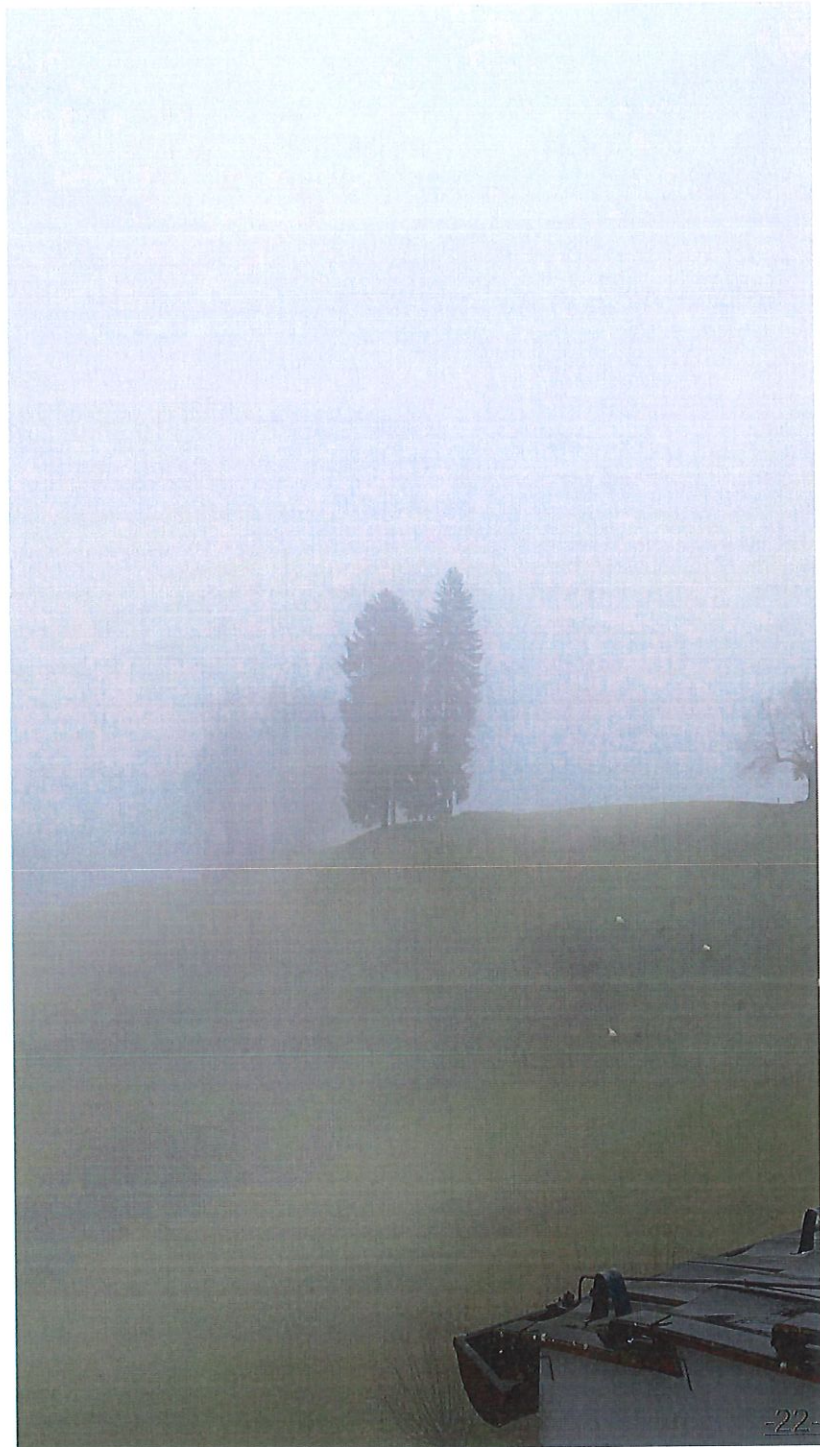








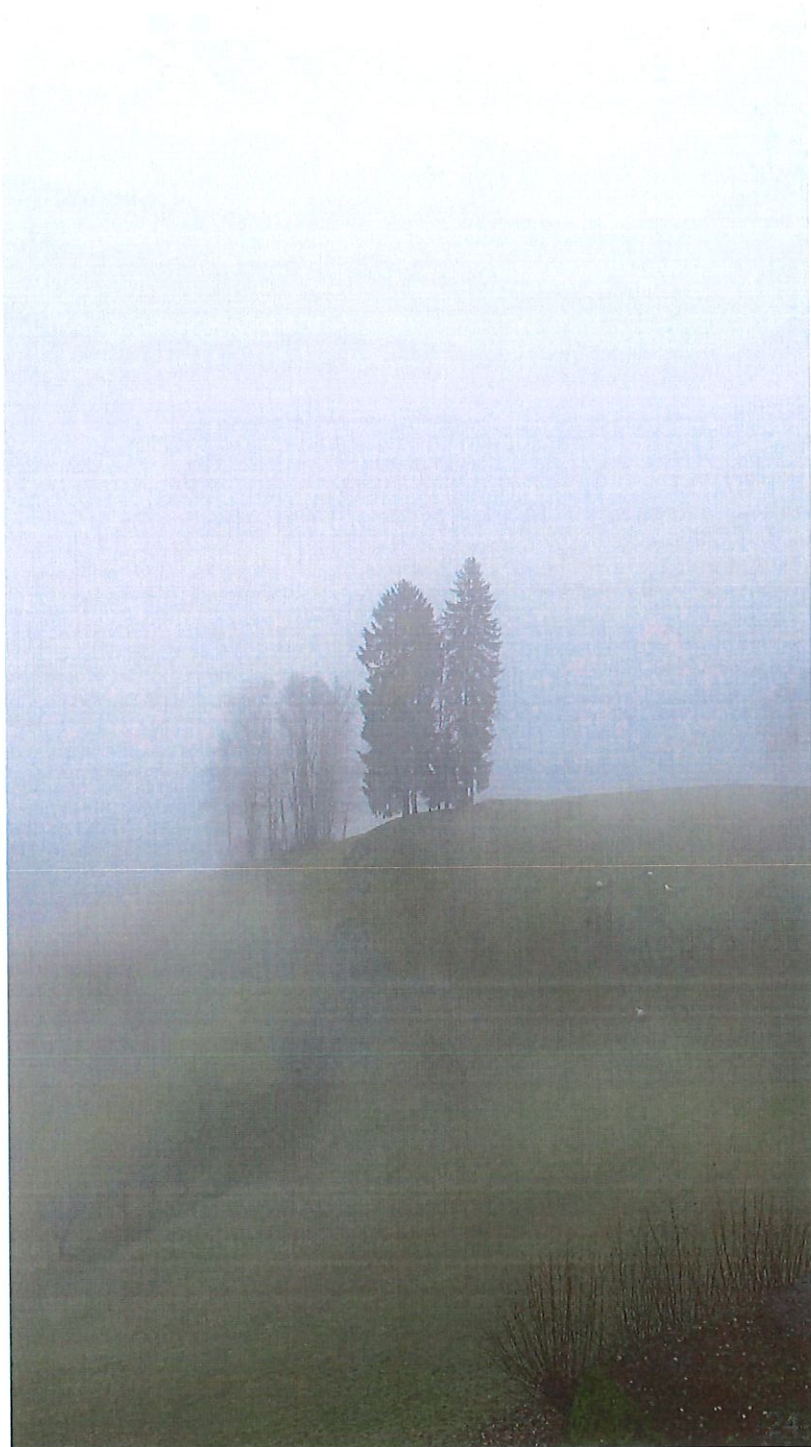




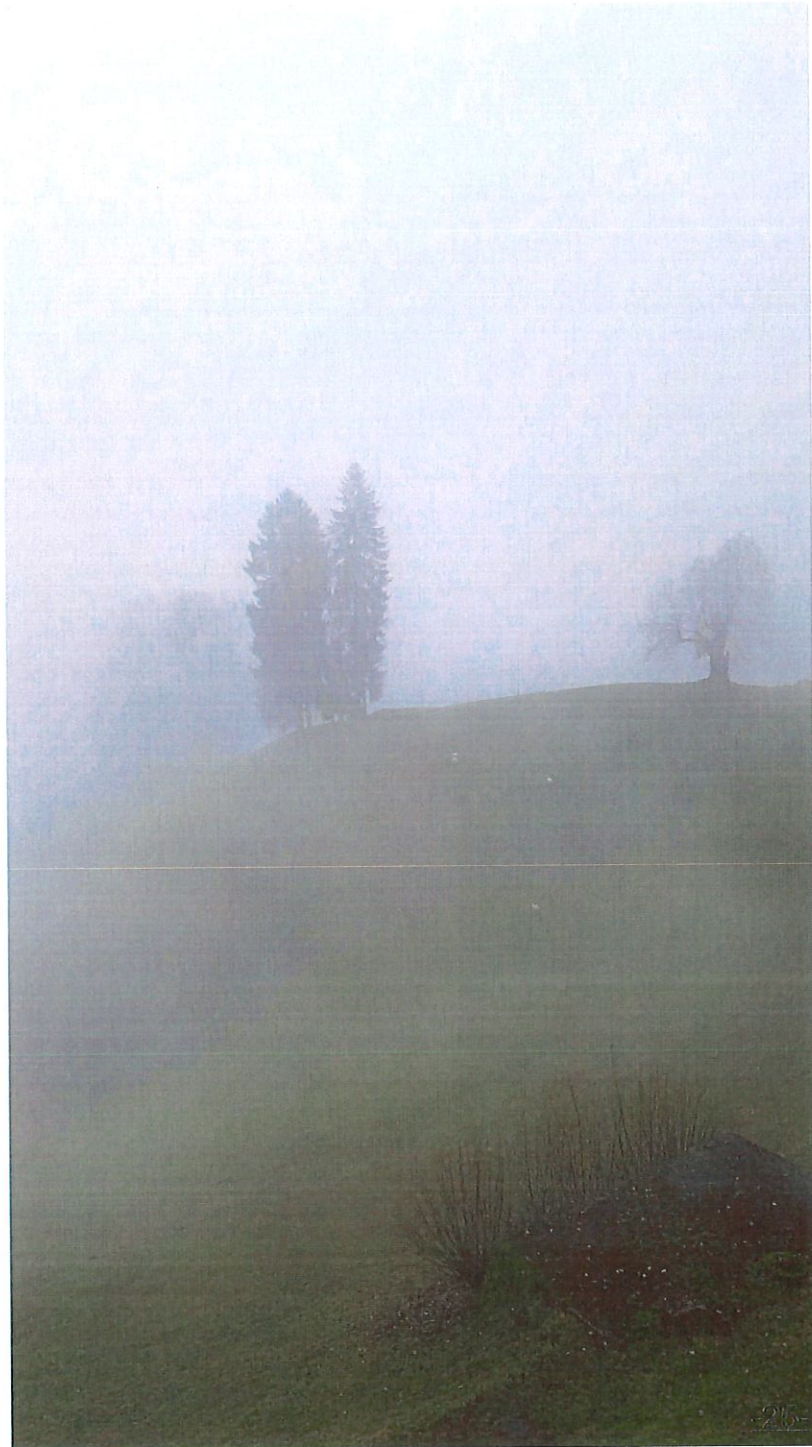




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